# <u>AFFIDAVIT</u>

The undersigned, being duly sworn, deposes and states:

- I, Kellie Williams, a United States Postal Inspector currently assigned in Charlotte, North Carolina, am tasked with investigating various offenses, including use of the U.S. Mail to transmit controlled substances in violation of 21 U.S.C. § 841. I have been so employed since 2017. I have received formal classroom training from the U.S. Postal Inspection Service during the twelve-week Postal Inspector Basic Training Academy in Potomac, Maryland. Through my investigations and training, I have become familiar with the methods and techniques employed by individuals committing financial fraud, narcotics smuggling and money laundering of illicit proceeds, as well as other law violations.
- 2. This affidavit is made in support of applications for search warrants for four United States Postal Service (USPS) parcels (hereafter, the "Suspect Parcels.") Suspect Parcels Numbered 1, 2, 3, and 4 are believed to contain controlled substances.
- 3. Descriptions of Parcels:

#### **Suspect Parcel Number 1:**

A brown cardboard box bearing USPS Priority Mail 2-Day tracking number 9505 5145 2349 0183 3310 45 entered into the USPS Mail Stream in California on July 1, 2020. It is addressed to "David Bonk, 122 Windbrook Dr., Troutman, NC 28166" with a return address of "Home Mart Int'1, 824 Wall St., Los Angeles, CA 90014." It is approximately 16" x 12" x 13" and weighs 8 pounds and 5.2 ounces. Postage Affixed is \$54.50.

## **Suspect Parcel Number 2:**

A white, red and blue USPS cardboard box bearing USPS Priority Mail 2-Day tracking number 9505 5145 2962 0183 1750 57 entered into the USPS Mail Stream in California on July 1, 2020. It is addressed to "David Bonk, 122 Windbrook Drive, Troutman, NC 28166" with a return address of "Home Mart Int'l, 824 Wall St., Lost Angeles, CA 90014." It is approximately 12" x 3.5" x 14.125" and weighs 9 pounds and 3.8 ounces. Postage Affixed is \$15.05.

## **Suspect Parcel Number 3:**

A brown cardboard box bearing USPS Priority Mail 2-Day tracking number 9505 5131 7807 0183 2533 86 entered into the USPS Mail Stream in California on July 1, 2020. It is addressed to "David Bonk, 122 Windbrook Dr., Troutman, NC 28166" with a return address of "Home Mart Int'l, 824 Wall St., Los Angeles, CA 90014." It is approximately 16" x 12" x 13" and weighs 31 pounds and 6.14 ounces. Postage Affixed is \$103.35.

## **Suspect Parcel Number 4:**

A brown cardboard box bearing USPS Priority Mail 2-Day tracking number 9505 5145 2349 0183 3310 52 entered into the USPS Mail Stream in California on July 1, 2020. It is addressed to "David Bonk, 122 Windbrook Dr. Troutman, NC 28166" with a return address of "Home Mart Int'l, 824 Wall St., Los Angeles, CA 90014." It is approximately 16" x 12" x 13" and weighs 34 pounds and 5.4 ounces. Postage Affixed is \$ 103.35.

4. I conducted a Name and Address Verification search for each and every **Suspect Parcel** Number 1, Number 2, Number 3 and Number 4. The results are as follows.

**Suspect Parcel Number 1-**The sender address is valid and the name is associated with the address. The recipient address is valid, but the name is not associated with the address.

**Suspect Parcel Number 2-** The sender address is valid and the name is associated with the address. The recipient address is valid, but the name is not associated with the address.

**Suspect Parcel Number 3-** The sender address is valid and the name is associated with the address. The recipient address is valid, but the name is not associated with the address.

**Suspect Parcel Number 4**- The sender address is valid and the name is associated with the address. The recipient address is valid, but the name is not associated with the address.

- 5. I am aware, through my training and experience, that people who utilize the U.S. Mail to distribute controlled substances and their proceeds commonly use fictitious names and addresses in an attempt to avoid detection by law enforcement agencies. I am also aware, through training and experience, that California is a known source area for narcotics.
- 6. I am aware, also through training and experience, that people often use the U.S. Mail, specifically

Express and Priority Mail, for the delivery of controlled substances for various reasons, some of which are listed below:

- A. Items sent via Express and Priority Mail are considered to be First-Class Mail.

  Therefore, these items cannot be examined without a federal search warrant.
- B. Express and Priority Mail are generally expected to be delivered in one to three days. This assures the sender of expedited delivery.
- C. Various dispatch times (times which a mailed item is transported to the next destination) are available to customers upon request and provides the sender an opportunity to have some control as to the arrival of the mailed item.
- D. Individuals desiring to either send or receive controlled substances and payments for these substances through the U.S. Mail can do so without having to provide identification. This reduces the possibility of revealing their true identity.
- 7. On July 6, 2020, Drug K-9 Handler Deputy C.J. Gregory with the Iredell County Sheriff's Office, was contacted and asked to provide a drug detecting K-9. Deputy C.J. Gregory responded to the Troutman Main Post Office, located in Troutman, North Carolina with drug detecting K-9 Rex on July 6, 2020.
- 8. Each and every **Suspect Parcel** was placed into a lineup. The line-up consisted of placing the **Suspect Parcels** among four other separate, but similar control parcels in the employee parking lot of the Troutman, NC Main Post Office. I observed as K-9 Rex walked among the parcels in the line-up. K-9 Rex alerted to each and every **Suspect Parcel** by sniffing the seams of the suspect package and pawing the suspect package, which is his signal to indicate the scent of a controlled substance. The examination took place at 8:58 a.m. on July 6, 2020.
- 9. In 2017, K-9 Rex was certified through Highland K-9 Handler Training. In September of 2018, K-9 Rex was certified through the North Carolina Police Dog Association (NCPDA). In November of 2019, K-9 Rex was certified through Highland K-9 Handler Training. K-9 Rex is certified as a multipurpose K-9. He is certified in Narcotics and can detect the odor of marijuana, MDMA, heroin, methamphetamine and cocaine. He is also certified in Apprehension, Tracking/Trailing and article searches. Deputy C.J. Gregory and K-9 Rex train several hours each month to make sure he is proficient in each field of his training.
- 10. Based on the above facts, I believe that probable cause exists that each and every **Suspect Parcels**

Numbered 1, 2, 3, and 4 contains at least one controlled substance, in violation of 21 U.S.C. § 841. As such, I respectfully request that a Search Warrant be issued for the **Suspect Parcels 1, 2, 3, and 4.** 

//s// Kellie Williams	
Kellie Williams	
U.S. Postal Inspector	

Sworn to and subscribed before me this  $7^{th}$  day of July 2020.

In accordance with Rule 4.1(b)(2)(A), the Affiant attested under oath to the contents of this Affidavit, which was submitted to me by reliable electronic means, on this 7th day of July, 2020, at 4:24 PM

Signed: July 7, 2020

David C. Keesler United States Magistrate Judge